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DEPT OF TRANSPORTATION
DOCKETS

2004 DEC 21 A 7:49

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

December 17, 2004

Docket Management Facility
U.S. Department of Transportation
Room PL-401, 400 Seventh Street SW
Washington, DC 20590-0001

Mr. Cy Oggins
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202

USCG-2004-16877-719

RE: Federal Docket Number USCG-2004-16877/ State Clearinghouse Number 2004021107

To Whom It May Concern:

I am writing to state my strong support for Cabrillo Port.

I am currently serving my second term as State President of the Congress of California Seniors. My wife Leah and I have lived in Ventura County for more than 18 years and continue to work hard to help improve the quality of life for many Latino and hard working families and underserved communities. In fact, I have devoted my entire life to serving and representing my community, as a volunteer because I feel strongly that everyone should have a voice.

I support Cabrillo Port because it will provide us with an affordable, reliable and safe natural gas supply to operate our businesses, warm our homes and cook our food. I support Cabrillo Port because it will deliver liquefied natural gas that has been used worldwide for decades to help prevent another energy crisis in the future.

I did not come to this decision lightly. Many who know me in the community know that I only support issues that I wholeheartedly believe in and strongly feel would be a benefit to the community.

As a father, veteran, husband, senior, community activist and volunteer in this county for years caring for the needs of the underserved and working class, I care deeply for our community and its safety. I would not endorse a project that I believed did not and could not make a commitment to ensure that public safety is the number one priority.

I believe the draft environmental impact report adequately and appropriately addresses the public safety concerns that have been expressed by those individuals opposed to the project. It definitely puts my mind at ease knowing that the top experts from your 3 agencies with the appropriate LNG and public safety backgrounds worked on this report to offer a valid and thoroughly vetted analysis regarding public safety.

I support an open, constructive and reasoned dialogue about Cabrillo Port because I believe when the people of this community and the state have all the facts, they will understand that Cabrillo Port will be built to the highest public safety and environmental standards and will provide

clean, safe, reliable energy to meet Ventura County's and California's ever growing energy needs today and in the future.

I hope that members of the community will hold judgment until they are able to read the environmental impact report and get all of the facts – facts based on science, technology and scientific, expert knowledge not myth and misinformation.

Sincerely,


Henry L. "Hank" Lacey

Origin: E&E Website
Date: 12/17/2004
First Name: Jonathan
Last Name: Lackie
Address: P.O. Box 456
City: Alpine
State: CA
Zip Code: 91903
Topic: Aesthetics
Comments: I remember as a college student attending UCSB how the offshore oil platforms ruined the sunsets. I applaud BHP for the innovative design of the FSRU and because of its location 14 miles offshore, the minimal impact that it will have on our sunsets.

G145-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/20/2004
First Name: Robert
Last Name: Lackie
Address: 70 Viejas Grade Rd.
City: Alpine
State: CA
Zip Code: 91901
Topic: Socioeconomics

Comments: I love California. It has been my home for a long time, but I am concerned about my children. It looks to me like we are denying our children, our future, the opportunity to live their lives and raise their families in this beautiful state by making everything so expensive that they will not be able to afford to live here. In Southern California we really saw that with the electricity crisis we had a couple of years ago. Companies had to close their doors and lay off employees because they couldn't afford the drastic increase in electricity rates. This is not the kind of California I want for my children. Let's look to the future for once and approve projects like the Cabrillo Deepwater Port.

G359-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/02/2004
First Name: Reider
Last Name: Larsen
City: Malibu
State: CA
Zip Code: 90265

G010

Topic: Other/General Comment

Comments: please, i beg of you, on my knees even, that you do not put a barge off of our coast. Not only is it unwanted, but its effects are only negative. Sure it creates a few jobs, however, it is a serious risk not only to those who work on it, but to those even here on the coast. If a ship that large carrying that much natural gas were to be hit by something causing it to explode, it could very well take out hundreds, even thousands of homes and lives of those on the coast. The noise it creates will adversely affect our beloved marine life, it will be nothing but an albatross around our necks, a burden which we as a concious people do not want to bear. Please, take yourselves elsewhere.

G010-1

Section 4.2.7.6 and the Independent Risk Assessment (Appendix C1) contain information on public safety impacts from various incidents at the FSRU. The analysis indicates that the maximum impact distance of an accident would involve a vapor cloud dispersion extending 6.3 nautical miles (7.3 miles) from the FSRU. The FSRU would be located approximately 12.01 nautical miles (13.83 miles) offshore; therefore, consequences of an accident involving LNG transport by carrier and storage on the FSRU would extend no closer than 5.7 nautical miles (6.5 miles) from the shoreline. Figure ES-1 depicts the consequence distances surrounding the FSRU location for worst credible events.

G010-2

Section 4.7.4 contains information on this topic under Impacts BioMar-3 and -5.

G010-1**G010-2**

Personally, i am strongly opposed to the transportation of LNG off of our
coasts. I make no regard to the claims that transportation of LNG is
absolutely safe, the danger is always there, for a leak, malfunction, or even a
possible terrorist attack. Operational mishaps and other threats aside, the
tanker itself poses a serious threat to the health of our marine life. Any
ecosystem is a very delicate thing, a disturbance of this magnitude could throw
off any number of things, all chances i do not want to have to take. This
looming spectre we are planning to desecrate our horizon with is an albatross
hanging around our neck, a weighty load which i do not wish for us to bear

G501-1

G501-2

G501-3

G501-4

G501-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

G501-2

Sections 4.2.2, 4.2.6.1, 4.2.7.6 and Appendix C contain information on public safety, including the potential threat of a terrorist attack.

G501-3

Sections 4.7.4 and 4.8.4 discuss this topic.

G501-4

Section 4.4 and Appendix F contain information on visual resources, impacts, and mitigation. Appendix F describes how visibility from various distances was evaluated and provides additional simulations prepared for viewpoints at elevated sites along the Malibu coastline and inland areas.

Origin: E&E Website
 Date: 11/30/2004
 First Name: David
 Last Name: Laufer
 Title: Resident of Oxnard
 Address: 5147 Corbina Way
 City: Oxnard
 State: CA
 Zip Code: 93035
 Phone No.: 805-985-4028
 Email Address: dldipudiate@msn.com

G008

Topic: Public Safety: Hazards and Risk Analysis

Comments: The Hazards and Risk Analysis is deficient in the following:

1. No specific identification and evaluation of emergency response costs in the event accident;
2. No specific identification and evaluation of allocation of response costs among governmental entities and applicant;
3. No discussion of dispute resolution procedures to resolve allocation of emergency response costs;
4. No discussion or evaluation of the type of insurance that should be required to assure no transfer of response costs to governments in the event of emergency;
5. No discussion of readiness of response team and equipment to deal with known risks; and
6. No discussion of risk benefit to communities affected by the project, ie, will taxes paid by applicant cover all costs to be incurred in project and the procedures to assure alleviation of risks to public health and property.

G008-1

Section 4.2.5 contains information on liability in case of an accident and reimbursement for local agencies.

G008-2

Section 4.2.5 contains information on the Applicant's insurance coverage and cost recovery for incidents.

G008-3

Section 4.2.5 contains information on the Applicant's insurance coverage and cost recovery for incidents.

G008-4

Section 4.2.5 contains information on the Applicant's insurance coverage and cost recovery for incidents.

G008-5

Section 4.16.1.2 contains revised text on this topic.

G008-1

G008-6

Section 4.2 and the Independent Risk Assessment (see Appendix C1) contain information on this topic.

G008-2

G008-3

G008-4

G008-5

G008-6

Comment Form—Cabrillo Port LNG Deepwater Port draft EIS/EIR

Name (Please Print): DAVID LAUFER Source: Public Meeting - Oxnard AM
 Organization/Agency: RESIDENT Date: 11/30/2004
 Street Address: 5147 CORBINA WAY
 City: OXNARD State: CA Zip Code: 93035
 Email address: DLDISPUDI.ATE@MSN.COM

Please provide written comments in the space below and drop this form into the comment box.

You may also submit comments

- Electronically through the Project Web site at <http://www.cabrilloport.ene.com>
- Electronically through the Docket Management System Web site (docket number 16877) at <http://dms.dot.gov>
- Or by mail or email to following addresses:

Docket Management Facility
 Room PL-401
 400 Seventh Street SW
 Washington, DC 20590-0001

California State Lands Commission
 100 Howe Avenue, Suite 100-South
 Sacramento, CA 95825
ogginsc@slc.ca.gov
 Attention: Cy Oggins

All comments must be received by 2 p.m. PST, December 20, 2004

Comments (Use other side or attach additional sheets if necessary):

How much property & general liability
will cover the start up & continuing
operations of the CABRILLO PORT PROJECT?

WHAT IS THE AMOUNT OF SELF
INSURANCE FOR THE PROJECT.

G398-1

David Laufer 805-985-4025

No action will be taken until the environmental review process is completed.

G398-1

Section 4.2.5 contains information on the Applicant's insurance coverage and cost recovery for incidents.

Origin: E&E Website
Date: 12/19/2004
First Name: Stan
Last Name: Leatherman
Address: 8205 Oak Knoll Dr.
City: Roseville
State: CA
Zip Code: 95678
Topic: Socioeconomics, Other/General Comment

Comments: You always hear about the economic benefits of a project on the local economy. However, after seeing some real amounts Cabrillo Port could bring in, I was encouraged. It's estimated that the port will bring in a \$20 million an year boost, state government will get \$3 million a year in tax revenues, and locally economies could see half-million a year. These communities need more financial support, without taking more out of individuals pockets.

G237-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website

Date: 12/15/2004

First Name: Carolyn

Last Name: Lee

Address: 1831 15th Ave

City: San Francisco

State: CA

Zip Code: 94122

Topic: Alternatives

Comments: Hopefully, a day will come when California will not need to rely on fossil fuels to power our daily lives. Unfortunately, looking at the current state of renewable energy sources shows that day will not come for some time. Until then, we need cleaner energy sources like natural gas to provide the energy we need. The Cabrillo Port project will help accomplish this. We need this project!

G028-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/20/2004
First Name: Bernie
Last Name: Lemieux
Address: 324 Valencia St.
City: Vallejo
State: CA
Zip Code: 96002
Topic: Other/General Comment

Comments: What I would like to know in regard to this project is who is complaining about it? Who is making negative comments? And when they are making their comments are they enjoying the benefits of natural gas in their homes? Perhaps they took a hot shower prior to writing a comment on this project, or cooked a nice meal. Maybe they live north and are heating their homes with natural gas. It's frustrating to me that the very people who try to trash projects such as these reap the benefits of what it could potentially produce. We need more natural gas, period. We're lucky to get the opportunity to have it produced in a way that's unobtrusive to our lives. While I love that your taking my comment into consideration, I also hope you are reviewing the EIS and making decisions based on fact. In case you couldn't tell, I'm for this project.

G352-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/19/2004
First Name: Joyce
Last Name: Levengood
Address: 6509 Misty Creek Dr.
City: Citrus Heights, CA 95621
Topic: Recreation
Comments: I am pleased to have raised my children in such a wonderful state full of recreational opportunities. Initially was against Cabrillo Port because I thought it would interfere with people recreating. However, I see no reason as to why it would. My son can still sail his boat and we can still have a natural gas project that is offshore, creating less pollution onshore. I am now in complete favor of this project.

G236-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Comment Form—Cabrillo Port LNG Deepwater Port draft EIS/EIR

Name (Please Print): Gerald Levy Dec 2, 2004
 Organization/Agency: Private Citizen
 Street Address: 2204 Vina del Mar
 City: OXNARD State: CA Zip Code: 93035
 Email address: gerrylevy@adelphia.net

Please provide written comments in the space below and drop this form into the comment box.

You may also submit comments

- Electronically through the Project Web site at <http://www.cabrilloport.ene.com>
- Electronically through the Docket Management System Web site (docket number 16877) at <http://dms.dot.gov>.
- Or by mail or email to following addresses:

Docket Management Facility
 Room PL-401
 400 Seventh Street SW
 Washington, DC 20590-0001

California State Lands Commission
 100 Howe Avenue, Suite 100-South
 Sacramento, CA 95825
 ogginsc@slc.ca.gov
 Attention: Cy Oggins

All comments must be received by 2 p.m. PST, December 20, 2004

Comments (Use other side or attach additional sheets if necessary): Dec 3 2004 is

the twentieth anniversary of one of the worst environmental
disasters in history. An accident at the Union Carbide
plant caused the deaths of over 7000 people. This
was an extremely low probability event which no one
had predicted. There is no way to quantify the
probability of extremely unlikely events occurring. What
was the a priori probability of an airliner striking the
World Trade Center on the same day as a third airplane

G502-1

No action will be taken until the environmental review process is completed.

G502-1

Section 4.2.6.1 provides a frequency analysis of an accidental or intentional event.

struck the pentagon. Zero? ab. But it was extremely small, so low that no precautions were taken. G502-1 (cont.)

In the case of the Cabrillo port we know that there are two possible scenarios for disaster:

1) An earthquake rupturing the pressured pipeline any ~~where~~ in the populated area of Oxnard. This is a seismically active area. If it happened in Carlsbad NM ~~it would~~ spontaneously it could happen here in a seismically induced pipeline rupture. G502-2

2) The high pressure gasline on the coast presents a very attractive target to terrorists. The Al Qaeda have shown themselves to be unscrupulously clever and the enormous energy potential offered by the Cabrillo port project makes a target which would be very hard to defend. G502-3

Please my family and friends live here and are put at risk by this project. We stand to gain nothing for this risk to be decided upon, not by my neighbors, but by people who are distant and not in the position of having their family's at risk.

From the comments made ^{and the public meetings this week} there does not appear to have been a realistic ^{and the public meetings this week} ~~seismic~~ evaluation by independent experts. G502-4

G502-2

Section 4.11.4 discusses seismic impacts and mitigation.

The El Paso Natural Gas pipeline accident in 2000 near Carlsbad, New Mexico, was one of several that prompted the DOT PHMSA Office of Pipeline Safety to promulgate additional safety requirements for pipelines routed near more densely populated areas (see 49 CFR 192, Subpart O). These requirements are applicable to many locations along the proposed and alternative pipeline routes for the proposed Project.

G502-3

Sections 4.2.2, 4.2.6.1, 4.2.7.6 and Appendix C contain information on the public safety, including the potential threat of a terrorist attack on the FSRU. Section 4.2.8 discusses the consequences of pipeline accidents, which would be similar to those resulting from a terrorist attack on the pipeline.

G502-4

Section 4.11 discusses geologic resources and hazards. Section 4.11.1.2 discusses earthquake faults and seismicity. Section 4.11.4 discusses geological impacts and mitigation.

DEC-20-2004 15:45

PTL ASSOCIATES

281 376 3495 P.02/04

308862

December 17, 2004

Source:
USCG Docket

Date: 12/20/04

VIA FACSIMILE (202 493-2251) AND U.S. MAILDocket Management Facility
U.S. Department of Transportation, Room PL-401
400 Seventh Street SW
Washington, DC 20590-0001Re: BHP Billiton Cabrillo Port Liquefied Natural Gas Deepwater Port Project
Docket Number, USCG-2004-16877 - 7/3**To Whom It May Concern:**

The following comments are submitted relative to the BHP Billiton Draft EIS in Docket Number, USCG-2004-16877. The comments are directed toward section 4.2 on Public Safety in part because of questionable representations and in part because the use of a "worst case" scenario, admittedly not credible and even less credible for an onshore terminal, is an obvious attempt to competitively misuse public concerns for public safety in an attempt to discredit onshore facilities. Specifically:

Section 4.2, Page 4.2, Lines 1/8: The worst case is not for decision making but rather the spectrum of credible incidents. Although public safety is one primary concern relative to hazards and risks, the vulnerability to credible incidents affect the economic welfare of millions of people dependent on natural gas is also a primary concern and one of the several criteria for the decision process. However, in real life, almost any activity has some risks associated and society accepts such risks, in part based on benefits and in part based on cost. The cost for the offshore approach compared to alternatives can not be ignored or dismissed.

Page 8, Line 36: Is the project contingent on finding an LNG source wherein the delivered LNG will meet California natural gas specifications?

Page 15, Line 23: The terrorist risk process described does not include estimates of probability, hence meaningless from a risk perspective.

Page 22, Lines 14-28: The USCG 500 m safety zone is intended to prevent accidents, not to provide an equivalent to exclusion zones.

Page 25, Lines 1-40: The instantaneous release of all LNG from the three Moss storage spheres. This is in response to "public scoping questions" rather than any serious consideration or engineering rationale.

Page 15, Line 3: The consequences are evaluated "without estimating the likelihood of occurrence". This statement disqualifies the evaluation as a risk assessment.

G439-1

The Independent Risk Assessment (IRA) has been updated since issuance of the October 2004 Draft EIS/EIR. The lead agencies directed preparation of the current IRA and Sandia National Laboratories independently reviewed it, as discussed in Section 4.2 and Appendix C. Section 4.2, Appendix C1, and Appendix C2 contain additional information on this topic.

As stated in Section 4.2.7.6, "The site-specific IRA completed in support of this document applies only to the proposed Project FSRU at its proposed offshore location. The results and conclusions from that assessment do not apply to any other offshore or onshore LNG import and regasification facility."

G439-2

Section 4.2 contains revised text on public safety issues associated with the proposed Project. It does not analyze or draw conclusions about the safety of onshore LNG facilities. The U.S. Department of Energy's Sandia National Laboratories assisted in the definition of worst credible release scenarios and concurred with the definition of worst credible release scenarios. See Appendix C2.

G439-3

As indicated in Section 4.6.2, the natural gas imported by the proposed Project would need to meet the requirements of Rule 30 and General Order 58-A of the California Public Utilities Commission (CPUC) or it could not be accepted for distribution by SoCalGas. Rule 30, as described, has specific requirements, including a heating value range.

Section 4.6.2 contains additional information on the regulatory setting affecting air quality and a revised discussion of the heating value of imported natural gas that incorporates the recent rulemaking by the CPUC. An analysis of the impacts of the CPUC rulemaking is beyond the scope of this document as required by NEPA and the CEQA.

G439-4

Table 4.2-2 and Sections 4.2.6.1 and 4.2.7.6 contain information on the threat of terrorist attacks.

G439-5

Sections 2.2.4, 4.3.1.4, and 4.3.4 address the size of the safety zone, how it would be established, and the potential impacts on marine traffic. The FSRU would be able to rotate 360° around the mooring turret. The safety zone would extend 500 m from the circle formed by the FSRU's stern, the outer edge of the facility, rotating

around the mooring turret. See Figure 4.3-4 for an illustration of the potential safety zone and area to be avoided. The safety zone could not be made any larger because its size is governed by international law. Unauthorized vessels are restricted from entering a safety zone without explicit approval of the DWP operator. Failure to comply constitutes a violation of Federal regulation.

G439-6

NEPA does not require "worst-case analysis" but does require the agency to prepare a summary of existing relevant and credible scientific evidence and an evaluation of adverse impacts based on generally accepted scientific approaches or research methods. However, the Independent Risk Assessment (IRA) (Appendix C1) defines and evaluates representative worst credible cases (scenarios of events that would lead to the most serious potential impacts on public safety). These included accidents that would affect one, two, or all three tanks of the FSRU.

As shown in Tables 4.2-1, 4.2-2, 4.2-7, and 4.2-8, the release of the contents of all three tanks (the entire contents of the FSRU and an attending LNG carrier) is addressed in the escalation scenario associated with a large intentional event. Section 4.2.7.6 contains additional information on how intentional events are addressed. Although the 2006 U.S. Department of Energy's Sandia National Laboratories third-party technical review of the 2004 IRA found that the three-tank simultaneous release (a massive LNG release in a short time period) was not credible, Sandia recommended the consideration of a cascading (escalation) three-tank scenario.

G439-7

Section 4.2.6.1 describes the frequency analysis and Appendix C1 provides estimated frequencies for the scenarios analyzed.

Page 15, Line 23: The frequency or probability--has not been estimate is a cop-out, as is defaults to the worst case which is not credible. Not estimating (including uncertainties) the probability renders the risk assessment meaningless, in particular, for decision making.

G439-7
cont'd

Page 18, Table 4.2.2-2: Is WAMIT really appropriate for blast waves? Sandia analysis should be a better source. Is Fire Dynamics Simulator better than LNG fire test data? In order to be meaningful, the burn-back mechanisms must be incorporated in order to determine the transient size of the fire, flame front location, non homogeneity of the mixture and duration time.

G439-8

Page 81, Line 32: The estimated frequency of a high energy impact may be appropriate in a port where there is traffic control, tugs and typically a geometry where a high angle impact is not possible.

G439-9

Page 18, Line 18: The worst case assumption is not acceptable or meaningful for an evaluation of risk.

G439-10

Page 24, Line 8: Neither the spread of LNG without evaporating or a sustained pool fire of that diameter are credible.

G439-11

The public safety section 4.2 explains that there is no significant public risk because there is no public within the area of potential consequences, even assuming the "worst case" is the incident involving the FSRU. Taken at face value, the conclusion is valid. However, the implications are misleading, perhaps intentionally so. Many offshore terminals competing with onshore terminals claim or suggest that the rationale for going offshore is increased public safety. This is a comparison which fails to identify "compared with what?". This has been exacerbated by technically flawed adverse publicity and some valid levels of concerns for certain proposed terminal sites. However, many sites have acceptable public safety/risk levels where there is no significant risk and the risk is much lower than other activities, marine and otherwise. Thus the "worst case" assumption is not generically the basis for safety evaluation or a determination of acceptable risk. It is not the right assumption for decision making.

G439-12

A valid risk assessment should be used including the causative mechanisms, their probability (quantitative estimates) and corresponding consequences.

The perspective of voluntary and involuntary risk is important in evaluating risk for an LNG activity and the determination of risk acceptability. Sky diving is a voluntary risk. Getting hit by a meteor is an involuntary risk. There is a whole spectrum of risks which have a combination of voluntary and involuntary aspects. Examples abound in our society. As most activities have some benefit to somebody, it is relevant to get a perception of the nature of these benefits and to whom they accrue. The NIMBY syndrome is a manifestation of the inequity of negatives and benefits. Perhaps auto speed limits are an instructive example. A driver voluntarily increases his risk by increasing speed, presumably for his/her benefit. Speed limits are set by regulatory process which limits risk based on site specific factors and experience but do not, nor intend to, reduce the risk to zero. Keeping an acceptably safe flow of traffic is a benefit to all but does not produce zero risk.

G439-8

The Independent Risk Assessment (IRA) has been updated since issuance of the October 2004 Draft EIS/EIR. The lead agencies directed preparation of the current IRA, and the U.S. Department of Energy's Sandia National Laboratories independently reviewed it, as discussed in Section 4.2 and Appendix C.

Section 4.2.7.6 and the IRA (Appendix C1) discuss the models and assumptions used and the verification process. Sandia National Laboratories (Appendix C2) concluded that the models used were appropriate and produced valid results.

G439-9

See the response to Comment G439-6.

G439-10

See the response to Comment G439-1.

G439-11

Section 4.2 contains revised information. As shown on Table 4.2-1, the time for maximum distance for a release includes both dispersion and evaporation. Section 2.3.4 and Figure 2.2 of the IRA (see Appendix C1) contain additional information on this topic.

G439-12

Section 4.2.7.6 and the Independent Risk Assessment (Appendix C1) contain information on public safety impacts from various incidents at the FSRU. The analysis indicates that the maximum impact distance of an accident would involve a vapor cloud dispersion extending 6.3 nautical miles (7.3 miles) from the FSRU. The FSRU would be located approximately 12.01 nautical miles (13.83 miles) offshore; therefore, consequences of an accident involving LNG transport by carrier and storage on the FSRU would extend no closer than 5.7 nautical miles (6.5 miles) from the shoreline. Figure ES-1 depicts the consequence distances surrounding the FSRU location for worst credible events.

DEC-20-2004 15:46

PTL ASSOCIATES

281 376 3495 P.04/04

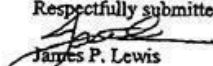
The Project Description Section (§ 2.3.1.5) contains a reference to an "aluminum tank shell" in which LNG is to be stored at the FSRU. Is an aluminum tank proven in terms of ensuring public safety? Can an aluminum tank provide the same level of safety as a steel tank? The LNG industry has worked with aluminum spherical cargo tanks and, to a lesser extent, aluminum onshore storage tanks. However, cryogenic steel is the preferred material because of strength, weldability, lower thermal conductivity, fire resistance and fatigue resistance. The welding on aluminum must be conducted on freshly prepared surfaces before oxides form from atmospheric exposure. This is a difficult quality control problem.

Fatigue resistance represents another critical issue with the use of aluminum tank shells. In LNG carriers, the trips are either with full cargo tanks or with almost full tanks to keep the tanks cold. Partially filled cargo tanks are avoided because violent sloshing occurs due to the cumulative energy build up from wave and ship motions. Both the *Polar Alaska* and the *Arctic Tokyo* sustained cargo tank damage as a result of sloshing even with full cargos. The FSRU will seldom be either full or empty, but will typically have partially filled cargo tanks. This will create a continuous, high energy sloshing which will contribute to continuous stress reversals and fatigue. The EIR/EIS does not adequately evaluate and discuss these legitimate safety issues.

The Project Description Section (§ 2.3.1.5) states that the FSRU will be loaded with 264,000 gallons of diesel fuel, with the fuel to be used for initial power generation during the installation and commissioning process. This fuel is to be stored in "two steel, single-walled tanks." This aspect of the Project constitutes a safety and environmental risk, in light of the large volume of fuel to be stored in only single-walled tanks. For example, single-walled underground storage tanks have been barred in California since 1998 in California (and other jurisdictions) because of concern for the potential of unauthorized releases of petroleum or other environmentally hazardous substances. Why then is the Project proposing only single-walled tanks? The EIR/EIS should consider double-walled tanks or some type of double containment as well.

Impeding benefits to society by misrepresentation and exaggeration of LNG risk scenarios is truly an irresponsible disservice to society.

Respectfully submitted,


James P. Lewis

James P. Lewis, P.E., P.Eng.
Chairman
PTL Associates, Inc.
20119 Stuebner Airline, Ste. C
Spring, TX 77379
Ph: (281) 376-9128
Fx: (281) 376-3495
jlewis@ptllng.com

G439-13

G439-13

Section 3.3.9.2 contains information on this topic: "...MARAD does not have a predisposition toward any of the alternative LNG storage technologies... MARAD believes that any of these technologies can be acceptable...[T]he USCG will review, approve, and comment on all plans and specifications..."

G439-14

Section 2.2.2.2 clarifies that diesel would be stored in tanks within the double-hulled FSRU, providing secondary containment.

G439-15

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

G439-14

G439-15

Origin: E&E Website
Date: 12/20/2004
First Name: Peter
Last Name: Lewis
Address: 1763 Santa Barbara St.
City: San Diego
State: CA
Zip Code: 92107
Topic: Other/General Comment

Comments: I am responding to your request for public comment on the proposed Cabrillo Deepwater Port LNG terminal project. As a citizen, I have been concerned for some time that worthwhile, environmentally sound projects continue to be blocked for the wrong reasons. Recent events clearly indicate a need for significant increases in the supply of sources of energy. These sources clearly need to be compatible with environmental concerns which I trust have been addressed in the proposed LNG project. However, too often we are witnessing environmental supporters using litigation and other tactics to deny the development of urgently needed projects. I strongly urge the governmental agencies involved in the approval of the terminal project to objectively look at the technical considerations of the project, and avoid resorting to stonewalling tactics, including environmental litigation.

G353-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/20/2004
First Name: Tom
Last Name: Lewis
Address: P.O. Box 1548
City: Alpine
State: CA
Zip Code: 91903
Topic: Environmental Justice

Comments: I am concerned about California's environment. It's what makes California such a beautiful and wonderful place to work, live and raise a family. That's what I like about the Cabrillo Deepwater Port. It's going to be 14 miles off the coast, in the middle of the ocean. We will hardly be able to see it, it will have a minimal impact on marine life, and the pipes will be underground once it gets close to the coast. Not only that, but it will provide a great supply of Natural Gas, which is one of the cleanest burning energy sources. Seems to me like this project is a win-win for California and our environment.

G301-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/18/2004
First Name: Linda
Last Name: Linderman
Title: Program Manager
Address: 1360 La Mirada Way
City: Escondido
State: CA
Zip Code: 92026
Email Address: dllind@msn.com
Topic: Energy and Minerals
Comments: California really needs other energy resources and LNG is one option. I support this project.

G311-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

FROM :

FAX NO. :

Dec. 20 2004 10:17AM P1



December 20, 2004

VIA FACSIMILE

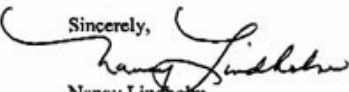
Mr. Cy Oggins
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202

RE: State Clearinghouse Number 2004021107
Cabrillo Port Liquefied Natural Gas Deepwater Port Draft EIS/EIR

Dear Mr. Oggins:

The Oxnard Chamber of Commerce believes the Cabrillo Port Draft EIS/EIR documents the proposed project poses no threat to public safety outside of the proposed precautionary zone, and encourages the appropriate public agencies to approve the study. The Chamber also believes there is a substantial need to increase supplies of natural gas to California and encourages the development of such sources.

Sincerely,



Nancy Lindeholm
President/CEO

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 11/28/2004
First Name: Mackie
Last Name: Lindsey
Address: 605 Lawnwood Way
City: Oxnard
State: CA
Zip Code: 93030
Phone No.: 805-485-0565
Email: mackie@thomasventura.com
Address:
Topic: Public Safety: Hazards and Risk Analysis
Comments: I, along with thousands and thousands of Oxnard and Port Hueneme residents STONGLY OPPOSE THE PROPOSED LNG PLANT. Low Risk is not acceptable. In plain words we don't want it and plan to strongly oppose it. I have emailed the governor and am urging others to do so.

G007-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

308493

USCG-2004-16877-632

2004/G503

From: "Mackie Lindsey" <mackie@thomasventura.com>
To: "Cy Oggins" <OGGINSC@slc.ca.gov>
Date: 12/2/04 11:54AM
Subject: Re: LNG PROJECT, Oxnard, CA

I attended the meeting in Oxnard on Tuesday evening.
I understand this Port is in International Waters and out
of the jurisdiction of both California and the United States
Federal Government. Is this correct? If so could you
please explain who has jurisdiction?

G503-1

Mackie Lindsey
THOMAS ASSOCIATES
4125 Market St. Suite 12
Ventura, CA 93003
805-644-8990
FAX 805-644-8961
mackie@thomasventura.com

G503-1

Section 1.1 discusses Federal and State jurisdiction for the
deepwater port and associated infrastructure.

30889

USCG-2004-16877-628

2004/G504

From: "Mackie Lindsey" <mackie@thomasventura.com>
To: <ogginsc@slc.ca.gov>
Date: 10/19/04 1:36PM
Subject: LNG Import Terminal, Oxnard, CA

Please be advised I am adamantly opposed to this project. There are thousands and thousands of people along the route the pipeline will follow inland, many of them are school children as there are several schools along that path. As you know there is also the Channel Islands Harbor and the Port Mugu/Port Hueneme Naval Base. It is irresponsible to even consider an offshore plant and the inland pipelines as proposed.

Mackie Lindsey
605 Lawnwood Way
Oxnard, CA 93030

G504-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Section 4.2.8 contains information on safety requirements for pipelines. Section 4.13.1 discusses the proximity of the proposed pipeline routes to residences and schools.

G504-1

From: "Mackie Lindsey" <mackie@thomasventura.com>
To: <ogginsc@slc.ca.gov>
Date: 11/28/04 7:28AM
Subject: LNG PROJECT

The people of Oxnard strongly oppose this dangerous facility. You people need to have your heads examined trying to place a facility like this in a greatly populated area. Why not up the coast where you would not endanger thousands of people including many school children, an important naval base and only deep water port between L. A. and San Francisco. I have emailed the governor and am urging everyone else to do so.,

Mackie Lindsey
605 Lawnwood Way
Oxnard, CA 93030

G538-1

G538-2

G538-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

G538-2

Section 3.3.7 contains information on the specific California locations considered in the alternatives analysis. The deepwater port would be 12.01 nautical miles (13.83 miles) offshore, as shown on Figure ES-1.

Origin: E&E Website
Date: 12/15/2004
First Name: Stephenson
Last Name: Lisa
Address: 20722 Elfin Forest Rd
City: Escondido
State: CA
Zip Code: 92029
Email: surfhorseranch@aol.com
Address:
Topic: Energy and Minerals

Comments: I am in favor of the Cabrillo Liquefied Natural Gas Deepwater Port. I feel that California and our nation need to constantly develop new energy sources and become self reliant. We all need to stop complaining and support this project!

G032-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/15/2004
First Name: James
Last Name: Little
Title: Senor
Address: 292 Avenida de la Vereda
City: Ojai
State: CA
Zip Code: 93023
Phone No.: 805-646-6260
Email Address: jim_little@patagonia.com
Topic: Biological Resources - Marine
Comments: Please ensure sufficient time in your permitting process to perform a thorough environmental analysis.

G031-1

All deepwater port applications fall under the authority of the Deepwater Port Act, which requires that a decision on the application be made within 330 days of the publication of the Notice of Application in the Federal Register. The Notice of Application for the Cabrillo Port Project was published in the Federal Register on January 27, 2004. Although the comment period (53 days) could not be extended at that time, a March 2006 Revised Draft EIR was recirculated under the CEQA for an additional public review period of 60 days. Section 1.4.1 contains additional information on this topic.

Section 1.5 contains information on opportunities for public comment. After the MARAD final license hearing, the public will have 45 days to comment on the Final EIS/EIR and the license application. The Federal and State agencies will have an additional 45 days to provide comments to the MARAD Administrator. The Administrator must issue the Record of Decision within 90 days after the final license hearing. The CSLC will hold a hearing to certify the EIR and make the decision whether to grant a lease. The California Coastal Commission will also hold a hearing. Comments received will be evaluated before any final decision is made regarding the proposed Project.

Origin: E&E Website
 Date: 12/03/2004
 First Name: Victor
 Last Name: Lobl
 Topic: Other/General Comment

G011

Comments: I am a Malibu resident concerned about the Cabrillo Port Project. Although I am not certain whether or not there is truly a net long term value to southern California as well as the state and the nation, I am certain that a project of this magnitude must be evaluated with unprecedented care in these days when we know that the unknown can bring chaos and havoc in ways currently unimaginable. That is the one thing we should have learned from 9/11.

It is incumbent upon all those involved and those reviewing reports and plans to keep in mind that the primary issue is and should always be the long term health and safety of our population and well being of our planet. Though there may be strong indications that this project could help mitigate a future energy supply shortfall here in southern California, the focus must still remain on the potential risks.

We are not in an emergency state in our need for energy. But we are in an emergency state in our need for safety and protection of the long term well being of this planet. These issues must always take priority.

The urgency and fast tracking with which this project is moving forward appears to be allowing dubious methodology in evaluating the potential risks involved. Much is being overlooked or ignored. By all appearances this pace seems to be driven only by commercial and political interests. This must change. Those who have been given the responsibility of protecting our safety and planetary habitat must make those responsibilities paramount and not allow themselves to be swayed by any other criteria.

We have a shortage of officials and representatives in whom we, the public feel we can place our trust these days. Please show us that we are, indeed, your priority by making an unprecedented careful and thorough evaluation of this project. In order to achieve those standards, you must get it off the fast track. There is no need for you to do otherwise.

Sincerely,

Victor Lobl
 5923 Cavalleri Road
 Malibu 90265

G011-1

Section 1.2.3 contains updated information on natural gas needs in California. Forecast information has been obtained from the California Energy Commission.

G011-2

All deepwater port applications fall under the jurisdiction of the Deepwater Port Act. The Deepwater Port Act requires that a decision on the application is made within 330 days of the publication of the Notice of Application in the Federal Register. The Notice of Application for the Cabrillo Port Project was published in the Federal Register on January 27, 2004.

However, the project has been modified and extensive additional information was added to the March 2006 Revised Draft EIR, which was recirculated for an additional 60 day review period. Section 1.4.1 contains additional information on this topic.

Section 1.5 contains information on opportunities for public comment. The public will also have the opportunity to comment at a series of final public hearings, including a final public hearing conducted by MARAD and USCG with an associated comment period and hearings by the California State Lands Commission and the California Coastal Commission. Comments received will be evaluated before the final decision is made regarding the proposed Project.

G011-1

G011-2

Origin: E&E Website
Date: 12/19/2004
First Name: Jonny
Last Name: Lodewyk
Address: 70 E. Main St.
City: Green River
State: UT
Zip Code: 84525
Topic: Alternatives

Comments: Hello, I wanted to say that in the winter months here in Utah it gets very cold and since we have only propane to rely upon as our source of heat it is very hard to keep a business running through the winter. In fact there are a lot of business that close for the winter months partly because of the high price of keeping on the heat. We are in desperate need of another, cheaper, source of heat. This particular project may not directly benefit us in Utah but it will pave the way for further development in the natural gas arena which will ultimately be directed to us. I support this project. Than you.

G190-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/20/2004
First Name: Dee
Last Name: Longerbone
Address: 5155 San Juan Ave.
City: Fair Oaks
State: CA
Zip Code: 95628
Topic: Aesthetics, Air Quality, Biological Resources - Terrestrial, Public Safety:
Hazards and Risk Analysis, Other/General Comment
Comments: We have to make choices that will support the way we have chosen to live and our environment. We need more energy in California, and we need to keep energy costs down. However, no one wants to make attacks on the environment to do so. The Cabrillo Port project is the solution. It will provide for more natural gas, keeping prices reasonable. It will be located 14 miles offshore, miles away from marine sanctuaries. It will provide for cleaner air onshore, as any pollution the port may cause will stay out there - not to mention natural gas is a cleaner burning fuel. We hear a lot about the project being unsafe, but to the best of my knowledge, I can't believe that to be true. I don't believe a company is going to build a billion dollar project and then watch it go up in flames. I see absolutely no reason not to support this project.

G266-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/19/2004
First Name: Jerry
Last Name: Longerbone
Topic: Land Use

Comments: After living in and enjoying many places in the west, I was pleased to see a natural gas facility located offshore. Onshore it will have minimal land-based impacts as well. Since the gas storage is at sea it means less permanent structures that are invasive to wildlife and the natural pleasures of being lost outside. I am encouraged that this port will be allowed to happen based on this and so many other reasons.

G182-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

308763

USCG-2004-16877-689

I attended the hearing that was held at the Performing Arts Center in Oxnard on Nov. 30th but was unable to wait past 9pm to speak out in strong support of the project and the good jobs it will create for our area.

G414-
1 & 2Source:
USCG Docket

Date:

12/19/04

x Linda Lopez

Linda Lopez of 1901 North "H" St., Unit #2 in the city of Oxnard

2004 DEC 20 P 12:33

DEPT OF TRANSPORTATION
DOCKETS

Docket No. USCG-2004-16877
State Clearinghouse No.
20044021107

2004/G414

G414-1

The notices for the public meetings and the information provided at the public meetings indicated that commenters would speak in the order that their requests were received, after elected officials and representatives of government agencies were heard. We regret that you were unable to stay at the meeting to provide oral testimony; however, your submitted written comment carries the same weight as any oral comments provided at public hearings.

G414-2

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

La Paloma Generating Company, LLC

December 27, 2004

Docket management Facility
U.S. Department of Transportation
400 Seventh Street SW, Room PL-401
Washington, DC 20590-001

Subject: Reference Docket Number #16877
File No: 704.17.01

Document Control No: 04-0067
Response Required: No
Date Required: N/A

Dear Sirs,

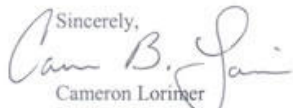
La Paloma Generating Company is a 1,022 MW nominally rated state of the art natural-gas fired, combined cycle electric power generation asset located in McKittrick, California. Commercial operations of this facility commenced in 2003.

La Paloma has reviewed the concept for the proposed Cabrillo Port floating liquefied natural gas receiving facility off the coast of Ventura County and is supportive in concept of this type of project. La Paloma is a major end user of natural gas in California and appreciates that all consumers benefit by the diversity of supply that would be created by the development and implementation of this type of project.

Commercial operations of a project of this nature should help to reduce the stress on the already burdened California natural gas market and should in concept provide some stability to the current volatile gas market through increased supply capabilities and diversification of major gas suppliers encouraging increased competition. A project like this should help to promote continued economic growth by providing lower cost energy, reliability and stability of fuel supplies.

For any project of this type, La Paloma recognizes and endorses strict adherence to environmental considerations, rules and regulations that will govern the design and development of such a project. This project or any project of this nature should be constructed and operated in an environmentally sound and sensitive manner.

Should you have any further comments or questions regarding this matter, please do not hesitate to contact me at (661) 762-6020.

Sincerely,

Cameron Lorimer
Engineering Manager
La Paloma Generating Plant

Cc: Plant File

POB175 (Mail)
1760 W. Skyline Road
(Deliveries)
McKittrick, CA 93251

661.762.6000
Fax: 661.762.6041

2004/G528

G528-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

The EIS/EIR identifies potential adverse environmental effects of the proposed Project. The mitigation measures identified in Chapter 6 are designed to minimize or avoid potential environmental impacts from the construction or operation of the proposed Project. In order to receive a license from the Maritime Administration and a lease from the California State Lands Commission, the Applicant must agree to implement the mitigation measures identified in the EIS/EIR and any other conditions that may be specified in the license and/or lease.

G528-1

Origin: E&E Website
Date: 12/19/2004
First Name: Jackie
Last Name: Love
Address: 8420 Rivergreen Dr.
City: Elverta
State: CA
Zip Code: 95626
Topic: Other/General Comment
Comments: Cabrillo Port was brought to my attention in a casual conversation. I used to work for an environmental organization, so I decided to do a little research. In reveiwing the documents I found absolutely nothing was not taken into consideration environmentally speaking. It's always interesting to me the people who use energy but do not stop to think where it comes from, how it's produced or how it gets into their homes. We must support projects that have the least environmental impacts and companies that are willing to spend the extra money to keep these impacts low. BHP is a company willing to do that. This project is great in every aspect.

G184-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/20/2004
First Name: Dale
Last Name: Lucas
Address: 8751 Augusta Court
City: Dublin
State: CA
Zip Code: 94568
Topic: Environmental Justice, Socioeconomics
Comments: I am pleased to see that BHP listened to the people of Oxnard and have chosen to lay pipeline away from neighborhoods, rich or poor. In the US, and in thrid world countries, we see poor people taking the brunt of the wealthy's desires; in this case, desire for more energy. I hope we can support projects such as Cabrillo Port for chosing not to take advantage of the poor. Really, with the port being located so far off shore, no community will have to deal with the negativities that accompany projects like this. That feels good to me. I hope all who review this document will take this into consideration as well as the many other possitive aspects of this project.

G265-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 12/19/2004
First Name: Ruth
Last Name: Lucas
Topic: Public Safety: Hazards and Risk Analysis
Comments: I had to laugh when someone brought up the possibility of a terrorist attack at Cabrillo Port or on a LNG tanker. The port will be located 14 miles offshore. Sure there would be a problem if there was a terrorist attack anywhere in the United States, but the possibility of it being 14 miles offshore are so unlikely, that I did have to laugh. It too will be under the protection of the Dept. of Homeland Security, but it seems to me if we're going to worry about terrorist attacks, we should worry about Las Angeles. This is yet another ploy of uneducated radical environmentalists trying to stop the development of anything.

G238-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website
Date: 11/22/2004
First Name: Laura
Last Name: Ludlam
Address: 2788 Oxford Ave
City: Grand Junction
State: CO
Zip Code: 81503
Phone No.: 970 433 2178
Email Address: d.ludlam@bresnan.net
Topic: Other/General Comment
Comments: Dear Discretionary Agencies,

During California's recent energy crunch I figured the state would respond positively to the possibility of new sources of imported natural gas. Natural gas is the cleanest burning hydrocarbon available, and millions depend on it for their very livelihood.

I have family in the area who are affected by this project and they are happy about the increased supply this facility will bring to the area. As a Colorado resident, I am also supportive of this project as it may relieve pressure from the Rocky Mountain Region to be the primary supplier of natural gas to Southern California.

Please don't let the voices of a few NIMBY (not in my backyard) obstructionists get in the way of what would obviously be a greater good for Southern California and our nation.

Sincerely,

Laura Ludlam
Grand Junction, CO

G006-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.